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MANAGEMENT LTD, SYNERGY MANAGEMENT  
SERVICES; and SYNERGY MARINE LTD.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

PEOPLE OF THE STATE OF CALIFORNIA ex ) Case No. C 09-01469 (SC)  
rel. DEPARTMENT OF FISH AND GAME; )  
PEOPLE OF THE STATE OF CALIFORNIA ex ) IN ADMIRALTY  
rel. CALIFORNIA REGIONAL WATER )  
QUALITY CONTROL BOARD, SAN )  
FRANCISCO BAY REGION; AND PEOPLE ) And consolidated cases:  
OF THE STATE OF CALIFORNIA ex rel. ) CV 08 5098 (SC),  
STATE LANDS COMMISSION, ) C 07 06045 (SC),  
 ) CV 07 05800 (SC),  
 ) CV 08 02052 (SC),  
Plaintiff, ) CV 08 2268 (SC)

vs.

REGAL STONE LTD.; FLEET )  
MANAGEMENT LTD.; HANJIN SHIPPING ) **STIPULATION TO CONSOLIDATE CASE**  
CO. LTD.; SYNERGY MANAGEMENT ) **WITH CASE NOS.:**  
SERVICES; SYNERGY MARINE LTD.; JOHN ) **CV 08 5098 (SC),**  
J. COTA, AN INDIVIDUAL; AND DOES 1 ) **C 07 06045 (SC),**  
THROUGH 100, ) **CV 07 05800 (SC),**  
 ) **CV 08 02052 (SC), AND**  
Defendants. ) **CV 08 2268 (SC)**  
 ) **FOR PRETRIAL AND DISCOVERY**  
 ) **PURPOSES**

///

1 THE PARTIES TO THIS STIPULATION, by and through their respective counsel  
2 hereby stipulate that this case shall be consolidated for pretrial and discovery purposes with the  
3 following related cases, which cases were consolidated by order of the Court dated February 3, 2009  
4 (collectively, "Consolidated Cases"):

5 Chelsea, LLC v. Regal Stone Limited, et al., Case No. 07-05800 (SC).

6 U.S. et al. v. M/V Cosco Busan, et al., Case No. 07-06045(SC)

7 The Continental Insurance Co. v. Regal Stone Limited, et al.,  
8 Case No. 08-02052 (SC).

9 The People of the State of California v. Regal Stone Limited, et al.,  
10 Case No. 08-2268 (SC).

11 Regal Stone Limited, et al. v. John J. Cota, The San Francisco Bar  
12 Pilot's Association, et al., Case No. 08-5098 (SC).

13 WHEREAS, on February 3, 2009, the Court issued an order consolidating the  
14 Consolidated Cases for pretrial and discovery purposes only.

15  
16 WHEREAS, this action was not subject to the February 3, 2009 Order consolidating  
17 the Related Cases for pretrial and discovery purposes only as this action was not removed to federal  
18 court until April 8, 2009.

19  
20 WHEREAS, the parties hereto agree that consolidation of this case for pretrial and  
21 discovery purposes is appropriate as this case arises out of the same underlying incident, the  
22 November 7, 2007 allision of the *M/V COSCO BUSAN* and the Bay Bridge and involves common  
23 questions of law or fact with the Consolidated Cases.

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1 WHEREAS, consolidating this action with the Consolidated Cases for pretrial and  
 2 discovery purposes only will save time and effort because it will avoid duplication of depositions and  
 3 other discovery.

4 **IT IS SO STIPULATED AND AGREED.**

5  
 6 **People of the State of California ex rel. Dep't of Fish and Game, et al. v.**

7 **Regal Stone Limited, et al., Case No. C 09-01469 (SC)**

8  
 9 DATED: August 31, 2009

/s/ Kevin D. Lesh

EDMUND G. BROWN JR.

J. MATTHEW RODRIQUEZ

MARY E. HACKENBRACHT

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Attorneys for Plaintiffs PEOPLE OF THE STATE OF  
 CALIFORNIA, EX REL. DEPARTMENT OF FISH  
 AND GAME; PEOPLE OF THE STATE OF  
 CALIFORNIA EX REL. CALIFORNIA REGIONAL  
 WATER QUALITY CONTROL BOARD, SAN  
 FRANCISCO BAY REGION; and PEOPLE OF THE  
 STATE OF CALIFORNIA EX REL STATE LANDS  
 COMMISSION

18  
 19 DATED: August 31, 2009

/s/ Joseph A. Walsh II

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24  
 25 DATED: August 31, 2009

/s/ Erich Paul Wise

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28 *[SIGNATURES CONTINUE ON NEXT PAGE]*

1 DATED: August 31, 2009

/s/ Walter Gerard Coppenrath, Jr.

2 WALTER GERARD COPPENRATH, JR.

3 COPPENRATH & ASSOCIATES

4 Attorneys for Defendant JOHN J. COTA

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6 *[SIGNATURES CONTINUE ON NEXT PAGE]*  
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**Regal Stone, et al. v. Cota, et al., Case No. 08-05098**

DATED August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II  
KEESAL, YOUNG & LOGAN  
Attorneys for Plaintiff  
REGAL STONE LIMITED and  
FLEET MANAGEMENT LTD

DATED: August 31, 2009

/s/ Ryan Donlon

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FRANCISCO BAR PILOTS

DATED: August 31, 2009

/s/ Kent Roberts

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NOAH JARRETT  
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SCHWABE, WILLIAMSON & WYATT  
Attorneys for Defendant  
JOHN COTA

*[SIGNATURES CONTINUE ON NEXT PAGE]*

U.S., et al. v. M/V Cosco Busan, et al., Case No. 07-06045

DATED: August 31, 2009

/s/ R. Michael Underhill

R. MICHAEL UNDERHILL

BRADLEY ROBERT O'BRIEN

U.S. DEPARTMENT OF JUSTICE

Attorney for Plaintiff, Counter-Defendant and Third  
Party Plaintiff

UNITED STATES OF AMERICA

DATED: August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II

KEESAL, YOUNG & LOGAN

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Defendants and Counter-Claimants REGAL STONE  
LIMITED and FLEET MANAGEMENT LTD

DATED: August 31, 2009

/s/ Walter Gerard Coppenrath, Jr.

WALTER GERARD COPPENRATH, JR.

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Attorneys for Defendant

JOHN COTA

DATED: August 31, 2009

/s/ Sonja Marie Dahl

SONJA MARIE DAHL

DONNELLY NELSON DEPOLO & MURRAY

Attorney for Third-Party Defendant

CHARLES CALZA

*[SIGNATURES CONTINUED ON NEXT PAGE]*

Chelsea, LLC, et al. v. Regal Stone, Ltd., et al., Case No. C-07-5800

DATED: August 31, 2009

/s/ William M. Audet

WILLIAM M. AUDET

ADEL NADJI

AUDET & PARTNERS, LLP

Attorney for Plaintiffs

CHELSEA, LLC, MARK RUSSO and

ALLEN LORETZ

DATED: August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II

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Attorneys for Defendants

REGAL STONE LIMITED, FLEET MANAGEMENT

LTD, M/V COSCO BUSAN, and SYNERGY

MARITIME LTD.

DATED: August 31, 2009

/s/ Erich Paul Wise

ERICH PAUL WISE

FYLN, DELICH & WISE

Attorneys for Defendant

HANJIN SHIPPING CO.

*[SIGNATURES CONTINUED ON NEXT PAGE]*

**Continental Insurance Co., et al. v. Cota, et al., Case No. 08-02052**

DATED: August 31, 2009

/s/ Samuel Harold Ruby

SAMUEL HAROLD RUBY  
KEVIN KIN-MAN HO  
BULLIVANT HOUSER BAILEY, PC  
Attorneys for Plaintiff/Counter-Defendant  
CONTINENTAL INSURANCE COMPANY

DATED: August 31, 2009

/s/ Marc J. Derewetzky

MARC J. DEREWETZKY  
MORISON HOLDEN DEREWETZKY & PROUGH,  
LLP  
Attorneys for Plaintiff-In-Intervention  
RLI INSURANCE COMPANY

DATED: August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II  
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Attorneys for Defendant M/V COSCO BUSAN and  
Defendants/Counter-Claimants/Third-Party Plaintiffs  
REGAL STONE LIMITED and FLEET  
MANAGEMENT LTD

DATED: August 31, 2009

/s/ David Schack

DAVID SCHACK  
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Attorneys for Cross-Defendant  
JOHN COTA

DATED: August 31, 2009

/s/ Randy Scott Erlewine

RANDY SCOTT ERLEWINE  
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Attorneys for Third Party Defendants  
THE SAN FRANCISCO BAR PILOTS and The SAN  
FRANCISCO BAR PILOTS BENEVOLENT &  
PROTECTIVE ASSOCIATION

*[SIGNATURES CONTINUED ON NEXT PAGE]*



**People of the State of California v. Regal Stone, Ltd., et al., Case No. 08-02268**

DATED: August 31, 2009

/s/ Jeffrey Richard Vincent

JEFFREY RICHARD VINCENT

JUDITH JOYCE LOACH

OFFICE OF THE ATTORNEY GENERAL OF THE  
STATE OF CALIFORNIA

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acting by and through the Board of Pilot Commissioners*

DATED: August 31, 2009

/s/ David Sullivan

BRUCE A. BEHRENS

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*Attorneys for Plaintiff and Counter-Defendant*

*PEOPLE OF THE STATE OF CALIFORNIA acting by  
and through the Department of Transportation*

DATED: August 31, 2009

/s/ Joseph A. Walsh II

JOSEPH A. WALSH II

KEESAL, YOUNG & LOGAN

*Attorneys for Defendant/Counter-Claimant*

*REGAL STONE LIMITED and Defendant M/V COSCO  
BUSAN*

*[SIGNATURES CONTINUED ON NEXT PAGE]*

**ORDER**

Based upon the foregoing Stipulation of the Parties, and good cause appearing therefore, Case No. C09-01469(SC) shall be consolidated for pretrial and discovery purposes with Case Nos. CV 08 5098 (SC), C 07 06045 (SC), CV 07 05800 (SC), CV 08 02052 (SC), and CV 08 2268 (SC).

**IT IS SO ORDERED.**

DATED: September 1, 2009

HONORABLE  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
JUDGE

